

Remarks

The Office Action mailed September 7, 2006 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 6-20 are now pending in this application. Claims 6-20 stand rejected. Claims 1-5 have been withdrawn. Claims 6 and 13 have been amended.

In accordance with 37 C.F.R. 1.136(a), a one month extension of time is submitted herewith to extend the due date of the response to the Office Action dated September 7, 2006, for the above-identified patent application from December 7, 2006, through and including January 7, 2006. In accordance with 37 C.F.R. 1.17(a)(1), authorization to charge a deposit account in the amount of \$120.00 to cover this extension of time request also is submitted herewith.

The rejection of Claims 6-20 under 35 U.S.C. § 112, second paragraph, is respectfully traversed. Claims 6 and 13 have been amended to recite “a first dovetail”. For the reasons set forth above, Applicants respectfully request that the Section 112 rejections of Claims 6-20 be withdrawn.

The rejection of Claims 6-8 under 35 U.S.C. § 102(e) as being anticipated by Jones et al. (U.S. Patent 6,830,240) (hereinafter referred to as “Jones”) is respectfully traversed.

Jones describes an apparatus for securing a component for manufacture. The apparatus includes a first clamping member that includes a biasing mechanism and a second clamping member that are each fixedly coupled to a fixture. The biasing mechanism is configured to align a component between the first and second clamping members, such that the component is secured therebetween. As such, the component can be manufactured, repaired, modified, and/or inspected without shifting or movement that may result in inaccurate manufacturing, repairing, modification, and/or inspection.

Notably, Jones does not describe nor suggest an apparatus that includes a first set of retainers that slidably couple to a body portion. Rather, Jones describes clamping members

that are coupled to a fixture with threaded bolts and/or rotatably coupled to a fixture. As such, the clamping members described in Jones are not capable of slidably coupling to a body portion. Moreover, Jones does not describe or suggest a first set of retainers that can be replaced by a second set of retainers that are configured to retain a second component that is different than the component retained by the first set of retainers. Specifically, Jones describes a first clamping member that “is fixedly coupled to dovetail clamp assembly 54 using any suitable means. For example, in one embodiment, first clamping member 58 is coupled to dovetail assembly 54 using threaded bolts and threaded nuts. In another embodiment, first clamping member 58 is coupled to dovetail clamp assembly 54 using threaded bolts and threaded holes in dovetail clamp assembly 54.” (Column 3, lines 31-38) As such, the first clamping member is bolted to the dovetail assembly and is not slidably coupled. Further, Jones never describes or suggests that the first clamping member is slidably coupled. Moreover, Jones does not describe or suggest replacing the first clamping member to machine a second component.

Moreover, Jones further describes that “biasing mechanism 62 [of first clamping member 58] is fixedly coupled to dovetail clamp assembly 54 using any suitable coupling means. In one embodiment, biasing mechanism 62 is coupled to dovetail clamp assembly using threaded bolts and treded nuts. In another embodiment, biasing mechanism 62 is coupled to dovetail assembly 54 using threaded bolts and threaded holes in dovetail assembly 54.” (Column 5, lines 18-22) As such, the first clamping member is bolted to the dovetail assembly via the biasing mechanism and is not slidably coupled. Further, Jones never describes or suggests that the first clamping member is slidably coupled. Moreover, Jones does not describe or suggest replacing the first clamping member to machine a second component.

In addition, Jones describes that “second clamping member 60 is *rotatably* coupled to fixture 52...” (Emphasis added) (Column 3, lines 39-40) As such, the second clamping member also is not slidably coupled. Further, Jones never describes or suggests, but rather teaches against, the second clamping member being slidably coupled. Moreover, Jones does

not describe or suggest replacing the second clamping member to machine a second component.

Claim 6 recites an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, wherein the assembly comprises “a base portion...a body portion coupled to said base portion...a first set of retainers removably coupled to said body portion, said first set of retainers comprising an upper portion having a profile that substantially mirrors a portion of a first dovetail, and a lower portion having a profile that substantially mirrors an opposite side of the first dovetail, wherein said first set of retainers slidably couple to said body portion, such that said first set of retainers can be replaced by a second set of retainers that are configured to retain a second dovetail that is different from the first dovetail.”

Jones does not describe nor suggest an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, as recited in Claim 6. More specifically, Jones does not describe nor suggest an assembly that includes a first set of retainers that slidably couple to a body portion, such that the first set of retainers can be replaced by a second set of retainers that are configured to retain a second component that is different from a first component that is retained by the first set of retainers. Rather, in contrast to the present invention, Jones describes clamping members that are coupled to a fixture with threaded bolts and/or rotatably coupled to a fixture. Therefore the clamping members described in Jones are not capable of slidably coupling. Moreover, Jones does not describe or suggest replacing the clamping members to machine a second component. Accordingly, for at least the reasons set forth above, Claim 6 is submitted to be patentable over Jones.

Claims 7 and 8 depend from independent Claim 6. When the recitations of Claims 7 and 8 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claims 7 and 8 likewise are patentable over Jones.

For the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 6-8 be withdrawn.

The rejection of Claims 9-20 under 35 U.S.C. § 103(a) as being unpatentable over Jones is respectfully traversed.

In addition to the arguments set forth below, Applicants respectfully submit that the Section 103 rejection of Claims 9-20 as being unpatentable over Jones is not a proper rejection. As is well established, the mere assertion that it would have been obvious to one of ordinary skill in the art to have modified Jones to obtain the claimed recitations of the present invention does not support a *prima facie* obvious rejection. Rather, each allegation of what would have been an obvious matter of design choice must always be supported by citation to some reference work recognized as standard in the pertinent art and the Applicants given the opportunity to challenge the correctness of the assertion or the notoriety or repute of the cited reference. Applicants have not been provided with the citation to any reference supporting the combinations made in the rejections. The rejections, therefore, fail to provide the Applicants with a fair opportunity to respond to the rejections, and fail to provide the Applicants with the opportunity to challenge the correctness of the rejections.

Specifically, with regard to Claims 9-12, Applicants respectfully submit that no prior art has been cited to support the assertion that “it is within general knowledge of one of ordinary skill in the art to appropriately couple retainers or clamping members to a body portion whether through openings or other suitable connections means.”

Regarding Claim 12, Applicants respectfully submit that no prior art has been cited to support the assertion that “the assembly of Jones et al. could accommodate a second set of retainers that is different than the first set of retainers and is configured to hold a second dovetail.”

With respect to Claim 13, Applicants respectfully submit that no prior art has been cited to support the assertion that “it would have been obvious to one of ordinary skill in the art at the time the invention was made that the assembly of Jones et al. could be used with a grinding wheel configured to machine a seal wire groove into a dovetail.”

With regard to Claim 14, Applicants respectfully submit that no prior art has been cited to support the assertion that it would be obvious to modify Jones to include a first

locking mechanism configured to secure a lower portion within a body portion, and a second locking mechanism coupled to an upper portion and configured to secure the upper portion within the body portion.

Regarding Claims 15-17, Applicants respectfully submit that no prior art has been cited to support the assertion that “it is within general knowledge of one of ordinary skill in the art to appropriately couple retainers or clamping members to a body portion whether through openings or other suitable connection means.”

With respect to Claim 18, Applicants respectfully submit that no prior art has been cited to support the assertion that “the assembly of Jones et al. could accommodate a second set of retainers that is different than the first set of retainers and is configured to hold a second dovetail.”

Moreover, with regard to Claim 19-20, Applicants respectfully submit that no prior art has been cited to support the assertion that “grinding wheels comprising cubic boron nitride and a cutting geometry that substantially mirrors a seal wire geometry are old and well known in the art.”

Of course, such combinations are impermissible, and for this reason, along with the reasons set forth below, Applicants request that the Section 103 rejection of Claim 9-20 be withdrawn.

Moreover, Jones does not describe or suggest the newly amended claim limitations of the present invention.

Specifically, Claims 9-12 depend from independent Claim 6, which recites an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, wherein the assembly comprises “a base portion...a body portion coupled to said base portion...a first set of retainers removably coupled to said body portion, said first set of retainers comprising an upper portion having a profile that substantially mirrors a portion of a first dovetail, and a lower portion having a profile that substantially mirrors an opposite side of the first dovetail, wherein said first set of retainers slidably couple to said body portion,

such that said first set of retainers can be replaced by a second set of retainers that are configured to retain a second dovetail that is different from the first dovetail."

Jones does not describe nor suggest an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, as recited in Claim 6. More specifically, Jones does not describe nor suggest an assembly that includes a first set of retainers that slidably couple to a body portion, such that the first set of retainers can be replaced by a second set of retainers that are configured to retain a second component that is different from a first component that is retained by the first set of retainers. Rather, in contrast to the present invention, Jones describes clamping members that are coupled to a fixture with threaded bolts and/or rotatably coupled to a fixture. Therefore the clamping members described in Jones are not capable of slidably coupling. Moreover, Jones does not describe or suggest replacing the clamping members to machine a second component. Accordingly, for at least the reasons set forth above, Claim 6 is submitted to be patentable over Jones.

Claims 9-12 depend from independent Claim 6. When the recitations of Claims 9-12 are considered in combination with the recitations of Claim 6, Applicants submit that dependent Claims 9-12 likewise are patentable over Jones.

Claim 13 recites a milling machine comprising "an assembly for machining a seal wire groove into a gas turbine rotor blade that includes a dovetail, said assembly comprising...a base portion...a body portion coupled to said base portion...a first set of retainers removably coupled to said body portion, said first set of retainers comprising an upper portion having a profile that substantially mirrors a portion of a first dovetail, and a lower portion having a profile that substantially mirrors an opposite side of the first dovetail wherein said first set of retainers slidably couple to said body portion, such that said first set of retainers can be replaced by a second set of retainers that are configured to retain a second dovetail that is different from the first dovetail...a grinding wheel configured to machine at least one seal wire groove into said dovetail."

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Jones does not describe nor suggest a milling machine, as recited in Claim 13. More specifically, Jones does not describe nor suggest a milling machine including an assembly that includes a first set of retainers that slidably couple to a body portion, such that the first set of retainers can be replaced by a second set of retainers that are configured to retain a second component that is different from a first component that is retained by the first set of retainers. Rather, in contrast to the present invention, Jones describes clamping members that are coupled to a fixture with threaded bolts and/or rotatably coupled to a fixture. Therefore the clamping members described in Jones are not capable of slidably removing. Moreover, Jones does not describe or suggest replacing the clamping members to machine a second component. Accordingly, for at least the reasons set forth above, Claim 13 is submitted to be patentable over Jones.

Claims 14-20 depend from independent Claim 13. When the recitations of Claims 14-20 are considered in combination with the recitations of Claim 13, Applicants submit that dependent Claims 14-20 likewise are patentable over Jones.

For the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 9-20 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,



Robert B. Reeser, III
Registration No. 45548
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070